

1 JENNER & BLOCK LLP
2 Reid J. Schar (*pro hac vice*)
3 RSchar@jenner.com
353 N. Clark Street
Chicago, IL 60654-3456
4 Telephone: +1 312 222 9350
Facsimile: +1 312 527 0484

5 CLARENCE DYER & COHEN LLP
6 Kate Dyer (Bar No. 171891)
7 kdyer@clarencedyer.com
8 899 Ellis Street
San Francisco, CA 94109-7807
Telephone: +1 415 749 1800
9 Facsimile: +1 415 749 1694

10 CRAVATH, SWAINE & MOORE LLP
11 Kevin J. Orsini (*pro hac vice*)
korsini@cravath.com
12 825 Eighth Avenue
New York, NY 10019
13 Telephone: +1 212 474 1000
Facsimile: +1 212 474 3700

14
15 Attorneys for Defendant PACIFIC GAS AND ELECTRIC
COMPANY

16
17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

19 UNITED STATES OF AMERICA,
20 Plaintiff,
21 v.
22 PACIFIC GAS AND ELECTRIC COMPANY,
23 Defendant.

24 Case No. 14-CR-00175-WHA

25 **PG&E'S RESPONSE TO REQUEST
FOR ITS 2021 WILDFIRE
MITIGATION PLAN**

26 Judge: Hon. William Alsup

1 Defendant Pacific Gas and Electric Company (“PG&E”) respectfully submits this
2 response to the Court’s February 9, 2021 request that PG&E file its 2021 Wildfire Mitigation
3 Plan (the “2021 WMP”). (Dkt. 1298.)

4 PG&E attaches hereto as Exhibit A the 2021 WMP that it filed with the CPUC on
5 February 5, 2021 as made available to the public through PG&E’s website.¹ PG&E notes that
6 there are numerous voluminous attachments to the 2021 WMP that PG&E is not including in this
7 filing, but which PG&E would file with the Court upon request and which have also been made
8 available to the public through PG&E’s website.^{2,3}

23 ¹ https://www.pge.com/pge_global/common/pdfs/safety/emergency-preparedness/natural-disaster/wildfires/wildfire-mitigation-plan/2021-Wildfire-Safety-Plan.pdf.

24 ² https://www.pge.com/pge_global/common/pdfs/safety/emergency-preparedness/natural-disaster/wildfires/wildfire-mitigation-plan/2021-WMP-Attachments.zip.

25 ³ The publicly available 2021 WMP filed herein and its publicly available attachments
26 contain limited redactions to protect confidential customer and employee information. PG&E
27 can provide unredacted copies under seal upon request.

1 Dated: February 10, 2021

Respectfully Submitted,

2 JENNER & BLOCK LLP

3
4 By: /s/ Reid J. Schar
Reid J. Schar (*pro hac vice*)

5 CRAVATH, SWAINE & MOORE LLP

6
7 By: /s/ Kevin J. Orsini
Kevin J. Orsini (*pro hac vice*)

8
9 CLARENCE DYER & COHEN LLP

10
11 By: /s/ Kate Dyer
Kate Dyer (Bar No. 171891)

12
13 Attorneys for Defendant PACIFIC
14 GAS AND ELECTRIC COMPANY

15
16
17
18
19
20
21
22
23
24
25
26
27
28